

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**DECLARATION OF DAVID
LABKOWSKI IN
OPPOSITION TO
PLAINTIFFS' MOTION FOR
SUMMARY JUDGMENT**

DAVID LABKOWSKI hereby declares, pursuant to 28 U.S.C. § 1746:

1. I am a member of the Bar of this Court and counsel for Defendant, Rudolph W. Giuliani ("Defendant"), in this case.

2. I personally reviewed Defendant's public livestream programs, *The Rudy Giuliani Show* and *America's Mayor Live*, which stream live on Rumble.com, to determine Defendant's location on various dates this year. I submit this Declaration to summarize those voluminous recordings.

3. I reviewed each of the videos referenced below. For each video, I was able to determine Defendant's location based on one of the following factors:

a. The Defendant explicitly stated his location at or around the beginning of the video;

b. Defendant's location was displayed on the bottom of the screen during the broadcast; and

c. After viewing all the videos, I recognized two backgrounds primarily used by Defendant: one corresponding to his location in New York and the other to his location in Palm Beach.

4. In the course of my review, I encountered certain videos, as to which, based on the foregoing factors, I was unable to definitively identify the Defendant's location. I have therefore omitted those videos from this submission.

5. On Monday, February 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E341): Who is Arseniy Petrovych Yatsenyuk?" I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4d28s3-americas-mayor-live-e341-who-is-arseniy-petrovych-yatsenyuk.html?e9s=src_v1_ucp.

6. On Tuesday, February 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E342): LIVE RESULTS—New York 3rd Congressional District Special Election." I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4d8jie-americas-mayor-live-e342-live-resultsnew-york-3rd-congressional-district-sp.html?e9s=src_v1_ucp.

7. On Wednesday, February 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled "America's Mayor Live (E343): LIVE UPDATES—Shooting in Kansas City, Missouri at the Super Bowl Parade." I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4dgpfm-americas-mayor-live-e343-live-updatesshooting-in-kansas-city-missouri-at-th.html?e9s=src_v1_ucp.

8. On Thursday, February 15, 2024, Defendant broadcasted live from Boynton Beach, Florida, an episode entitled "America's Mayor Live (E344): Fani Willis & Nathan Wade on Trial." I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4dntie-americas-mayor-live-e344-fani-willis-and-nathan-wade-on-trial.html?e9s=src_v1_ucp.

9. On Monday, February 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E346): Biden Administration Continues to Capitulate on the Global Stage.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4eg9xc-americas-mayor-live-e346-biden-administration-continues-to-capitulate-on-th.html?e9s=src_v1_ucp.

10. On Tuesday, February 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E347): The War on Gender.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4ep8er-americas-mayor-live-e347-the-war-on-gender.html?e9s=src_v1_ucp.

11. On Wednesday, February 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E348): Joe Biden's Brother, James Biden, Testifies Behind Closed Doors.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4ex9rt-americas-mayor-live-e348-joe-bidens-brother-james-biden-testifies-behind-cl.html?e9s=src_v1_ucp.

12. On Thursday, February 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E349): Democrat "Russian Collusion" Hoax 2.0.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4f4l8u-americas-mayor-live-e349-democrat-russian-collusion-hoax-2.0.html?e9s=src_v1_ucp.

13. On Friday, February 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E350): ELECTION 2024—The South Carolina Primary.” I hereby make the foregoing video recording available by means of the

following link: https://rumble.com/v4fbq53-americas-mayor-live-e350-election-2024the-south-carolina-primary.html?e9s=src_v1_ucp.

14. On Monday, February 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E351): ELECTION 2024—Previewing Michigan's Presidential Primary.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4fwkr9-americas-mayor-live-e351-election-2024previewing-michigans-presidential-pri.html?e9s=src_v1_ucp.

15. On Wednesday, February 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E353): Our Southern Border is Facing an INVASION.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4g9ohi-americas-mayor-live-e353-our-southern-border-is-facing-an-invasion.html?e9s=src_v1_ucp.

16. On Thursday, February 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E354): President Trump & Joe Biden's Southern Border Visits—Compare & Contrast.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4ghazr-americas-mayor-live-e354-president-trump-and-joe-bidens-southern-border-vis.html?e9s=src_v1_ucp.

17. On Friday, March 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E355): Joe Biden & Democrat Open-Border Policies Caused Laken Riley's Death.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4go0kw-americas-mayor-live-e355-joe-biden-and-democrat-open-border-policies-caused.html?e9s=src_v1_ucp.

18. On Monday, March 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E356): Supreme Court Rules Unanimously in President Donald Trump's Favor.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4hal5u-americas-mayor-live-e356-supreme-court-rules-unanimously-in-president-donal.html?e9s=src_v1_ucp.

19. On Tuesday, March 5, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E357): ELECTION 2024—Super Tuesday.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4hgza6-americas-mayor-live-e357-election-2024super-tuesday.html?e9s=src_v1_ucp.

20. On Wednesday, March 6, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E358): The REAL Reason Nikki Haley Dropped Out of the Race.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4hodgw-americas-mayor-live-e358-the-real-reason-nikki-haley-dropped-out-of-the-rac.html?e9s=src_v1_ucp.

21. On Thursday, March 7, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E359): The 2024 State of the Union Address.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4hu9n9-americas-mayor-live-e359-the-2024-state-of-the-union-address.html?e9s=src_v1_ucp.

22. On Monday, March 11, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E361): Breaking Down Joe Biden's \$7.3 TRILLION Budget.” I hereby make the foregoing video recording available by means of the

following link: https://rumble.com/v4ioq1u-americas-mayor-live-e361-breaking-down-joe-bidens-7.3-trillion-budget.html?e9s=src_v1_ucp.

23. On Tuesday, March 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E362): The Israeli–Palestinian conflict.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4ivrzx-americas-mayor-live-e362-the-israelipalestinian-conflict.html?e9s=src_v1_ucp.

24. On Wednesday, March 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E363): Judge DROPS Six Charges as Fani Willis's Phony RICO Case Falls Apart.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4j3bmi-americas-mayor-live-e363-judge-drops-six-charges-as-fani-williss-phony-rico.html?e9s=src_v1_ucp.

25. On Thursday, March 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E364): ELECTION 2024—Bellwether Michigan.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4jaq3l-americas-mayor-live-e364-election-2024bellwether-michigan.html?e9s=src_v1_ucp.

26. On Friday, March 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E365): The Dangers of Staying Silent in the Face of Injustice.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4jibr2-americas-mayor-live-e365-the-dangers-of-staying-silent-in-the-face-of-injus.html?e9s=src_v1_ucp.

27. On Monday, March 18, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E366): Biden Removes "Duty, Honor, Country" from West Point Mission Statement.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4k2us2-americas-mayor-live-e366-barack-obamas-undisclosed-private-meeting-with-the.html?e9s=src_v1_ucp.

28. On Tuesday, March 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E367): EU & The West Blast Russian Elections, but Silent on Trump Persecution.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4kak9u-americas-mayor-live-e367-eu-and-the-west-blast-russian-elections-but-silent.html?e9s=src_v1_ucp.

29. On Wednesday, March 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E368): Biden-World PANICS as President Trump Leads Virtually Every Poll.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4khnbo-americas-mayor-live-e368-biden-world-panics-as-president-trump-leads-virtua.html?e9s=src_v1_ucp.

30. On Thursday, March 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E369): ELECTION 2024—America at a Crossroads.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4kpgv3-americas-mayor-live-e369-election-2024america-at-a-crossroads.html?e9s=src_v1_ucp.

31. On Friday, March 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E370): Gunman Kill at Least 40 People Inside Moscow Concert Hall.” I hereby make the foregoing video recording available by means

of the following link: https://rumble.com/v4kx2m6-americas-mayor-live-e370-gunman-kill-at-least-40-people-inside-moscow-conce.html?e9s=src_v1_ucp.

32. On Monday, March 25, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E371): Appeals Court Rules Against Judge Engoron in Phony Fraud Case YET AGAIN.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4li1ff-americas-mayor-live-e371-appeals-court-rules-against-judge-engoron-in-phony.html?e9s=src_v1_ucp.

33. On Tuesday, March 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E372): Bridge COLLISION/COLLAPSE in Baltimore—Sign of Decaying Infrastructure?” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4lqos0-americas-mayor-live-e372-bridge-collisioncollapse-in-baltimoresign-of-decay.html?e9s=src_v1_ucp.

34. On Wednesday, March 27, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E373): Feds Search Sean 'Diddy' Combs' Properties in Sex Trafficking Probe.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4lx20w-americas-mayor-live-e373-feds-search-sean-diddy-combs-properties-in-sex-tra.html?e9s=src_v1_ucp.

35. On Thursday, March 28, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E374): Donald Trump Honors Fallen Officer; Biden Hosts High-Dollar Fundraiser.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4m5m50-americas-mayor-live-e374-donald-trump-honors-fallen-officer-biden-hosts-hig.html?e9s=src_v1_ucp.

36. On Friday, March 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E375): Honoring America's Real Heroes.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4mcjex-americas-mayor-live-e375-honoring-americas-real-heroes.html?e9s=src_v1_ucp.

37. On Monday, April 1, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E376): America is Lost—2024 is about Fighting to take it Back.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4mw7hk-americas-mayor-live-e376-america-is-lost2024-is-about-fighting-to-take-it-b.html?e9s=src_v1_ucp.

38. On Tuesday, April 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E377): Justice for All.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4n4m9t-americas-mayor-live-e377-justice-for-all.html?e9s=src_v1_ucp.

39. On Wednesday, April 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E378): The Democrat Party's Bizarre War Against Law Enforcement.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4navvo-americas-mayor-live-e378-the-democrat-partys-bizarre-war-against-law-enforc.html?e9s=src_v1_ucp.

40. On Thursday, April 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E379): NEW POLL—Trump Leads Biden in Six of Seven Swing States.” I hereby make the foregoing video recording available by means of

the following link: https://rumble.com/v4ni9je-americas-mayor-live-e379-new-polltrump-leads-biden-in-six-of-seven-swing-st.html?e9s=src_v1_ucp.

41. On Friday, April 5, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America's Mayor Live (E380): Earthquake Rattles New York City.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4nozy2-americas-mayor-live-e380-earthquake-rattles-new-york-city.html?e9s=src_v1_ucp.

42. On Tuesday, April 9, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (282): Our Experience with the Solar Eclipse from New Hampshire.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4ohqb5-americas-mayor-live-282-our-experience-with-the-solar-eclipse-from-new-hamp.html?e9s=src_v1_ucp.

43. On Wednesday, April 10, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (383): What to Make of the Chants of "Death to America" in Dearborn, Michigan.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4oolez-americas-mayor-live-383-what-to-make-of-the-chants-of-death-to-america-in-d.html?e9s=src_v1_ucp.

44. On Thursday, April 11, 2024, Defendant broadcasted live from Tulsa, Oklahoma, an episode entitled “America's Mayor Live (384): The Fall of New York City & How the Giuliani Playbook Can Spur a Revival.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4oyfor-americas-mayor-live-384-the-fall-of-new-york-city-and-how-the-giuliani-play.html?e9s=src_v1_ucp.

45. On Friday, April 12, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (385): Exclusive Report Warns of Imminent Attack by Iran.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4p482f-americas-mayor-live-385-exclusive-report-warns-of-imminent-attack-by-iran.html?e9s=src_v1_ucp.

46. On Monday, April 15, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E386): Biden Regime Goes ALL-IN on Dystopian Election Interference vs. Trump.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4po6zu-americas-mayor-live-e386-biden-regime-full-steam-ahead-w-dystopian-election.html?e9s=src_v1_ucp.

47. On Tuesday, April 16, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E387): The Consequences of the Left's Weaponization of the U.S. Justice System.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4pv38b-americas-mayor-live-e387-the-consequences-of-the-lefts-weaponization-of-the.html?e9s=src_v1_ucp.

48. On Wednesday, April 17, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E388): Democrats Vote to Continue Alien Invasion.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4q20e5-americas-mayor-live-e388-restricting-trump-to-campaigning-in-new-york-will-.html?e9s=src_v1_ucp.

49. On Thursday, April 18, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E389): Restricting Trump to Campaigning in New York will BACKFIRE on Democrats.” I hereby make the foregoing video recording

available by means of the following link: https://rumble.com/v4q95mq-americas-mayor-live-e389-trump-trial-day-three-update-and-analysis.html?e9s=src_v1_ucp.

50. On Friday, April 19, 2024, Defendant broadcasted live from New Hampshire, an episode entitled “America's Mayor Live (E390): Is Mike Johnson Relying on Democrats to Save Job as Speaker?” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4qgd8r-americas-mayor-live-e390-is-mike-johnson-relying-on-democrats-to-save-job-a.html?e9s=src_v1_ucp.

51. On Monday, April 22, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E391): Mayor Rudy Giuliani visits Harvard University.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4qzmg6-americas-mayor-live-e391-mayor-rudy-giuliani-visits-harvard-university.html?e9s=src_v1_ucp.

52. On Tuesday, April 23, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E392): Mayor Rudy Giuliani visits Columbia University.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4r70rh-americas-mayor-live-e392-mayor-rudy-giuliani-visits-columbia-university.html?e9s=src_v1_ucp.

53. On Wednesday, April 24, 2024, Defendant broadcasted live from Staten Island, New York, an episode entitled “America's Mayor Live (E393): Exposing the Truth on the College Protesters.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4req3o-americas-mayor-live-e393-exposing-the-truth-on-the-college-protesters.html?e9s=src_v1_ucp.

54. On Thursday, April 25, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E394): Supreme Court Appears Open to Partial Immunity for POTUS.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4rlpm9-americas-mayor-live-e394-supreme-court-open-to-partial-immunity-for-potus-a.html?e9s=src_v1_ucp.

55. On Monday, April 29, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (396): Protesters at Harvard Replace American Flag with Palestinian Flag.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4scfbw-americas-mayor-live-396-protesters-at-harvard-replace-american-flag-with-pa.html?e9s=src_v1_ucp.

56. On Tuesday, April 30, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (397): The Stunning Lack of Leadership at These So-Called Elite Universities.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4sj92-americas-mayor-live-397-the-stunning-lack-of-leadership-at-these-so-called-.html?e9s=src_v1_ucp.

57. On Wednesday, May 1, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (398): The Fall of the Ivy League Institutions.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4sqb0w-americas-mayor-live-398-the-fall-of-the-ivy-league-institutions.html?e9s=src_v1_ucp.

58. On Thursday, May 2, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (399): NEW POLL—Trump Widens Gap Over Biden.” I hereby make the foregoing video recording available by means of the following

link: https://rumble.com/v4sx75e-americas-mayor-live-399-new-polltrump-widens-gap-over-biden.html?e9s=src_v1_ucp.

59. On Monday, May 6, 2024, Defendant broadcasted live from South Florida, an episode entitled “America's Mayor Live (401): American Injustice.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4tmfde-americas-mayor-live-401-american-injustice.html?e9s=src_v1_ucp.

60. On Tuesday, May 7, 2024, Defendant broadcasted live from Miami, an episode entitled “America's Mayor Live (402): What Cuban-Americans can teach us about Socialism.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4ttyoo-americas-mayor-live-402-what-cuban-americans-can-teach-us-about-socialism.html?e9s=src_v1_ucp.

61. On Wednesday, May 8, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (403): Game Over for Special Counsel Jack Smith & Classified Documents Case.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4u07f3-americas-mayor-live-403-game-over-for-special-counsel-jack-smith-and-classi.html?e9s=src_v1_ucp.

62. On Thursday, May 9, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (404): Judge Merchan's Conflicts & Conduct Should Immediately Disqualify Him.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4u7x5o-americas-mayor-live-404-judge-merchans-conflicts-and-conduct-should-immedia.html?e9s=src_v1_ucp.

63. On Friday, May 10, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (405): The Importance of Fighting Against

Censorship in America.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4uey1l-americas-mayor-live-405-the-importance-of-fighting-against-censorship-in-am.html?e9s=src_v1_ucp.

64. On Sunday, May 12, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E1): Sunday, May 12, 2024.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4uoin2-uncovering-the-truth-e1-sunday-may-12-2024.html?e9s=src_v1_ucp.

65. On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show: Shocking NEW Evidence of Election Fraud that WABC Doesn't Want You to I hereby make the foregoing video recording available by means of the following link:.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4uwr dz-the-rudy-giuliani-show-shocking-new-evidence-of-election-fraud-that-wabc-do.html?e9s=src_v1_ucp.

66. On Monday, May 13, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (406): Michael Cohen Perjures Himself.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4uyj0z-america-s-mayor-live-406-michael-cohen-perjures-himself.html?e9s=src_v1_ucp.

67. On Wednesday, May 14, 2025, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E2): No One Knows Michael Cohen Like I Know Michael Cohen.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4v4ehw-the-rudy-giuliani-show-e2-no-one-knows-michael-cohen-like-i-know-michael-co.html?e9s=src_v1_ucp.

68. On Tuesday, May 14, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E407): The Truth About Michael Cohen.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4v5tf8-americas-mayor-live-e407-the-truth-about-michael-cohen.html?e9s=src_v1_ucp.

69. On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E3): Michael Cohen's Former Attorney Bob Costello Exposes Cohen's Lies.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4vdsi8-the-rudy-giuliani-show-e3-michael-cohens-former-attorney-bob-costello-expos.html?e9s=src_v1_ucp.

70. On Wednesday, May 15, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E408): Bob Costello Exposes Michael Cohen in EXPLOSIVE Congressional Hearing.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4vemzx-americas-mayor-live-e408-bob-costello-exposes-michael-cohen-in-explosive-co.html?e9s=src_v1_ucp.

71. On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E4): Why is Joe Biden Suddenly Eager to Debate?” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4vm9c6-the-rudy-giuliani-show-e4-why-is-joe-biden-suddenly-eager-to-debate.html?e9s=src_v1_ucp.

72. On Thursday, May 16, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E409): Michael Cohen's Former Attorney: 'He Told Me He Had Nothing On Trump'.” I hereby make the foregoing video recording

available by means of the following link: https://rumble.com/v4vn0ff-americas-mayor-live-e409-michael-cohens-former-attorney-he-told-me-he-had-n.html?e9s=src_v1_ucp.

73. On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E5): It Looks Like Michael Cohen Just Committed Perjury Again.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4vth53-the-rudy-giuliani-show-e5-it-looks-like-michael-cohen-just-committed-perjur.html?e9s=src_v1_ucp.

74. On Friday, May 17, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E410): Celebrating a Great American Life.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4vv19z-americas-mayor-live-e410-celebrating-a-great-american-life.html?e9s=src_v1_ucp.

75. On Sunday, May 19, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E2): Sunday, May 19, 2024.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4w4uv5-uncovering-the-truth-e2-sunday-may-19-2024.html?e9s=src_v1_ucp.

76. On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E6): Michael Cohen Admits to STEALING \$60,000 from Trump Organization.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4wdysi-the-rudy-giuliani-show-e6-michael-cohen-admits-to-stealing-60000-from-trump.html?e9s=src_v1_ucp.

77. On Monday, May 20, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E411): "This case is dead. It was dead on arrival" - Fmr Michael Cohen Advisor.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4wfn9-americas-mayor-live-e411-this-case-is-dead.-it-was-dead-on-arrival-fmr-mich.html?e9s=src_v1_ucp.

78. On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E7): Arizona—The Grand Canyon State.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4wlkat-the-rudy-giuliani-show-e7-arizonathe-grand-canyon-state.html?e9s=src_v1_ucp.

79. On Tuesday, May 21, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E412): Arizona—The Grand Canyon State.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4wnaqg-americas-mayor-live-e412-arizonathe-grand-canyon-state.html?e9s=src_v1_ucp.

80. On Wednesday, May 22, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E8): Biden Losing More and More Voters to "Uncommitted".” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4wsjsz-the-rudy-giuliani-show-e8-biden-losing-more-and-more-voters-to-uncommitted.html?e9s=src_v1_ucp.

81. On Thursday, May 23, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E9): President Trump Campaigns in the Bronx.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4wzl5z-the-rudy-giuliani-show-e9-president-trump-campaigns-in-the-bronx.html?e9s=src_v1_ucp.

82. On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “The Rudy Giuliani Show (E10): President Trump RALLIES in the Bronx.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4x6vw3-the-rudy-giuliani-show-e10-president-trump-rallies-in-the-bronx.html?e9s=src_v1_ucp.

83. On Friday, May 24, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “America's Mayor Live (E415): President Trump's MASSIVE RALLY in the Bronx.” I hereby make the foregoing video recording available by means of the following link:

https://rumble.com/v4x91c9-americas-mayor-live-e415-president-trumps-massive-rally-in-the-bronx.html?e9s=src_v1_ucp.

84. On Sunday, May 26, 2024, Defendant broadcasted live from Palm Beach, Florida, an episode entitled “Uncovering the Truth (E3): Sunday, May 26, 2024.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4xioj8-uncovering-the-truth-e3-sunday-may-26-2024.html?e9s=src_v1_ucp.

85. On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E11): Memorial Day—Honoring America's Fallen Heroes.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4xs940-the-rudy-giuliani-show-e11-monday-may-27-2024.html?e9s=src_v1_ucp.

86. On Monday, May 27, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E416): The History of Memorial Day—

Honoring America's Fallen Heroes.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4xtnt6-americas-mayor-live-e416-the-history-of-memorial-dayhonoring-americas-falle.html?e9s=src_v1_ucp.

87. On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E12): In Bizarre Move, Democrats Use Robert De Niro in Trump Trial Response.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4y1bn8-the-rudy-giuliani-show-e12-in-bizarre-move-democrats-use-robert-de-niro-in-.html?e9s=src_v1_ucp.

88. On Tuesday, May 28, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E417): Closing Arguments in President Trump's New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4y1y2h-americas-mayor-live-e417-closing-arguments-in-president-trumps-new-york-tri.html?e9s=src_v1_ucp.

89. On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E13): A Glaring Problem w/ New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4y9lr2-the-rudy-giuliani-show-e13-a-glaring-problem-w-new-york-trial.html?e9s=src_v1_ucp.

90. On Wednesday, May 29, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E418): Jury Begins Deliberations in New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4yai9o-americas-mayor-live-e418-jury-begins-deliberations-in-new-york-trial.html?e9s=src_v1_ucp.

91. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E14): Jury Deliberations Continue in New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4ygivt-the-rudy-giuliani-show-e14-jury-deliberations-continue-in-new-york-trial.html?e9s=src_v1_ucp.

92. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E419): Reaction to Guilty Verdict in President Trump's New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4yik78-americas-mayor-live-e419-day-two-of-jury-deliberations-conclude-in-presiden.html?e9s=src_v1_ucp.

93. On Thursday, May 30, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E419): Reaction to Guilty Verdict in President Trump's New York Trial.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4yjoif-americas-mayor-live-e419-reaction-to-guilty-verdict-in-president-trumps-new.html?e9s=src_v1_ucp.

94. On Friday, May 31, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E15): Breaking Down the Most Disgraceful & Illicit Trial in American History.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4yq7zr-the-rudy-giuliani-show-e15-breaking-down-the-most-disgraceful-and-illicit-t.html?e9s=src_v1_ucp.

95. On Sunday, June 2, 2024, Defendant broadcasted live from New York, New York, an episode entitled “Uncovering the Truth (E4): American Injustice.” I hereby make the

foregoing video recording available by means of the following link: https://rumble.com/v4z3q5e-uncovering-the-truth-e4-american-injustice.html?e9s=src_v1_ucp.

96. On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E16): Illegal Immigrant SHOOTs Two NYPD Officers in Brazen Attack.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4zcmo5-the-rudy-giuliani-show-e16-hunter-biden-jury-selection-in-federal-gun-trial.html?e9s=src_v1_ucp.

97. On Monday, June 3, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E421): Hunter Biden Trial Day 1—Jury Selected; Opening Statements on Tuesday.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4zehtu-americas-mayor-live-e421-hunter-biden-jury-selection-in-federal-gun-trial-b.html?e9s=src_v1_ucp.

98. On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “The Rudy Giuliani Show (E17): Joe Biden's Executive Order on Border an Election Year Gimmick.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4zku2c-americas-mayor-live-e164-remembering-the-great-pat-robertson.html?e9s=src_v1_ucp.

99. On Tuesday, June 4, 2024, Defendant broadcasted live from New York, New York, an episode entitled “America's Mayor Live (E422): Hunter Biden Trial Day 2—Opening Statements, First Witness Takes Stand.” I hereby make the foregoing video recording available by means of the following link: https://rumble.com/v4zmaxf-americas-mayor-live-e422-hunter-biden-trial-day-2opening-statements-first-w.html?e9s=src_v1_ucp.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed on October 16, 2024

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